

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

DWAIN EDWARD THOMAS,

Plaintiff,

v.

KEVIN STITT, *et al.*,

Defendants.

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Case No. CIV-20-944-D

MOTION FOR LEAVE TO WITHDRAW AS COUNSEL

I, Annie Chiang (the “Movant”), hereby move this Court for entry of an order granting leave to withdraw as counsel for Plaintiff Dwain Edward Thomas in the above-captioned matter, pursuant to Local Rule 83.5 of the United States District Court for the Western District of Oklahoma. In support of the Motion, the Movant states as follows:

1. Annie Chiang seeks leave to withdraw as counsel because she is leaving the firm Kirkland & Ellis LLP.

2. Plaintiff is represented and will continue to be represented by Movant’s colleague, Emily Merki Long, of the firm Kirkland & Ellis LLP, among other counsel.

3. Movant’s withdrawal will not affect or delay proceedings.

4. A proposed order is attached hereto as **Exhibit 1**.

I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

WHEREFORE, I respectfully request that the Court enter an Order granting Annie Chiang leave to withdraw as counsel for Plaintiff Dwain Edward Thomas in the above-captioned case.

Washington, District of Columbia
Dated: April 18, 2025

Respectfully submitted,

/s/ Annie Chiang
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